

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **Criminal No.** _____

v. : **Date Filed:** _____

KIRK HUDSON : **Violations:**

: **21 U.S.C. § 841(a)(1) (possession with**

: **intent to distribute a cocaine base**

: **(“crack”) - 1 count)**

: **21 U.S.C. § 841(a)(1) (possession with**

: **intent to distribute heroin – 1 count)**

: **18 U.S.C. § 924(c)(1) (possession of**

: **firearm in furtherance of a drug**

: **trafficking crime – 1 count)**

: **18 U.S.C. § 922(g)(1) (convicted felon**

: **in possession of a firearm – 1 count)**

: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 1, 2003, at Allentown, in the Eastern District of Pennsylvania,
defendant

KIRK HUDSON

knowingly and intentionally possessed with intent to distribute more than 50 grams, that is,
approximately 134 grams, of a mixture or substance containing a detectable amount of cocaine
base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2003, at Allentown, in the Eastern District of Pennsylvania,
defendant

KIRK HUDSON

knowingly and intentionally possessed with intent to distribute a mixture or substance containing
a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2003, at Allentown, in the Eastern District of Pennsylvania,
defendant

KIRK HUDSON

knowingly possessed a firearm, that is, an HWM, Model EA/R, 38 special/.357 magnum revolver, serial number 1051349, loaded with 6 live .357 caliber cartridges, a Beretta, Model M9-92FS, 9mm parabellum semiautomatic handgun, serial number 2793M9, a Ruger, Model P-97, .45 caliber semiautomatic handgun, with obliterated serial number, and a Heritage, Stealth Model C-2000, 9mm parabellum semiautomatic handgun, serial number A3132, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 1, 2003, at Allentown, in the Eastern District of Pennsylvania,
defendant

KIRK HUDSON,

having been convicted in a court of the State of New York of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting foreign and interstate commerce a firearm, that is, an HWM, Model EA/R, 38 special/.357 magnum revolver, serial number 1051349, loaded with 6 live .357 caliber cartridges, a Beretta, Model M9-92FS, 9mm parabellum semiautomatic handgun, serial number 2793M9, a Ruger, Model P-97, .45 caliber semiautomatic handgun, with obliterated serial number, and a Heritage, Stealth Model C-2000, 9mm parabellum semiautomatic handgun, serial number A3132.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c) set forth this indictment, the defendant

KIRK HUDSON

shall forfeit to the United States of America, pursuant to Title 18 United States Code, Section 924(d) and Title 28 United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

1. HWM, Model EA/R, 38 special/.357 magnum revolver, serial number 1051349, and 6 live .357 caliber cartridges;
2. Beretta , Model M9-92FS, 9mm parabellum semiautomatic handgun, serial number 2793M9;
3. Ruger, Model P-97, .45 caliber semiautomatic handgun, with obliterated serial number; and
4. Heritage, Stealth Model C-2000, 9mm parabellum semiautomatic handgun, serial number A3132.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney